



REGION 10
SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Tyson Foods Inc.

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act (CAA) Section 112(r) Risk Management Program (RMP) and the Emergency Planning and Community Right to Know Act (EPCRA) Sections 302, 311 and 312.

CAA Section 112(r) requires facilities that hold chemical over threshold quantities to have an RMP. EPCRA Section 311 requires facilities that store chemicals above reporting threshold to submit copies of the Safety Data Sheets (SDSs) or a list of these chemicals to the State Emergency Response Commission (SERC), the Local Emergency Planning Committee (LEPC), and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC and fire department. EPCRA Section 302 requires any facility that has any Extremely Hazardous Substance (EHS) above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name: Tyson Foods Inc.
Mailing Address: PO Box 4239
Pasco, WA 99302
Website: <https://tysonfreshmeats.com/>

FACILITY INFORMATION

Name: Tyson Fresh Meats, Pasco, WA
Facility Address: 13983 Dodd Road
Wallula, WA 99302
Latitude/Longitude: 46.136944/-118.913611
RMP Facility ID#: 1000 0000 6405
EPCRA Tier II ID#: WAD099143984
FRS ID#: 110000601616
EJ Concerns: No

CONTACT INFORMATION (RMP Implementation)

Name: Barbara Salter
Title: Complex Manager
Phone Number: (509) 547-7545
E-mail: barbara.salter@tyson

EMERGENCY CONTACT INFORMATION

Name: Jose Vergara
Title: Complex Engineer
Phone Number: (509) 543-4340
E-mail: jose.vergara@tyson.com

INSPECTION DETAILS

Inspection Date: May 15, 2024
Inspection Time: 09:00 a.m.-2:10 p.m.
Inspectors: Mhara Coffman, US EPA R10, Lead RMP/EPCRA Inspector
Terry Garcia, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Edward Johannes, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Peter Phillips, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Erin Williams, US EPA R10, RMP/EPCRA Inspector
Robert Faries, Weston Solutions, Inc., EPA START Contractor

On May 2, 2024 EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives, such as a union representative, have the right to participate in the RMP inspection. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility is unionized? Yes ☐ No ☒
If yes, name of union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
If yes, name/title:

GENERAL INFORMATION

The facility is regulated under RMP as a Program Level 3 facility and is owned and operated by Tyson Foods Inc. There are approximately 1,350 full-time employees on site. The facility was built in 1976 and purchased by Tyson Foods in 2001. The facility underwent a renovation to add a wing for Wendy's fast food chain beef production that was operational by 2019.

Tyson Fresh Meats, Pasco, WA is a beef processing and packaging facility. The facility utilizes anhydrous ammonia to cool controlled atmosphere (CA) rooms throughout the facility. The refrigeration process is comprised of two components, which the facility identifies as the Harvest Ammonia System and the Processing Ammonia System. Each system features a dedicated engine room. The facility has a three-level alarm system for atmospheric ammonia and lower explosive limit (LEL). When atmospheric ammonia levels reach 25 parts per million (ppm), the system triggers emergency ventilation and an audible/visible alarm. At 150 ppm emergency ventilation fans engage and ammonia alarms require a

manual reset. Refrigeration systems shut down when the atmosphere reaches 2% LEL (20,000 ppm). The facility stores EPCRA-regulated chemicals in the form of cleaning products stored in the Acid Base Storage Room and fuel for facility vehicles located at the Facility Fueling Station.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: May 7, 1999

Date of Latest Update: May 6, 2024

- Has the facility has been inspected in the past 5 years? Yes ☐ No ☒
If yes, date of last inspection:
- Is the facility High Risk? Yes ☐ No ☒

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000141374	Harvest Ammonia System	1000176849	1000099462	3	Ammonia, Anhydrous (7664-41-7)	55,345
1000141375	Processing Ammonia System	1000176850	1000099463	3	Ammonia, Anhydrous (7664-41-7)	78,495

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒
If yes, permit number:

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RPM reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
If either yes, date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2023 Tier II report submitted to the SERC? Yes ☒ No ☐
If yes, date Tier II was submitted: 29 February, 2024
If no, calendar year of the most recent Tier II:
- Was the 2023 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
If yes, date Tier II was submitted: 29 February, 2024
- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
If yes, is it correctly checked on the Tier II? Yes ☒ No ☐
- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold. See the attached Tier II, Attachment C, for inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
Anhydrous Ammonia	Yes	7664-41-7
Lead-Acid Batteries	Yes	007664-93-9
Unleaded Gasoline	No	086290-81-5
Peracetic Acid	Yes	79-21-0

EPCRA 311 – SDSs

EHS onsite include some cleaning supplies, lead acid batteries used in the facility's forklifts, and anhydrous ammonia used in the facility's refrigeration systems. See Attachment B for SDSs and chemical information on each EHS stored over the reporting threshold at the Facility.

EPCRA 302 – LEPC Coordination

The facility's last coordination with Walla Walla LEPC was a facility tour on 13 May, 2024.

LEPC

Agency: Walla Walla County LEPC
Program Contact: Chris Lee
Title: Director
Address: 27 North Second Ave.
Walla Walla, WA 99362
Phone Number: (509) 524-2902
Email: clee@co.walla-walla.wa.us
Website: co.walla-walla.wa.us

INSPECTION ENTRY

Mhara Coffman led the inspection entry. The inspection team met with Daniel Goldfarb at the Tyson Fresh Meats, Walla Walla, Washington facility. The team arrived at the facility at 9:00 a.m. and was joined by the following facility personnel:

Name	Title
Seth Schwarzkopf	RMP Area Manager
Luke Klingenberg	Refrigeration Manager
Barbara Salter	Complex Manager
Jose Vergara	Plant Engineer
Bianca Bandurski	Industrial Engineer
Daniel Goldfarb	Environmental Manager

- Were any SERC, LEPC or fire department representative present? Yes ☒ No ☐

If yes, names and titles of representatives: Patrick Purcell, Walla Walla EMD

- Is the facility a first responder? Yes ☒ No ☐

If no, responding agency:

The inspection team was escorted to a conference room. Introductions were made by Mhara Coffman, who provided a summary of the RMP and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. The covered areas of the facility are the Harvest Building, Process Building, and Wendy's Wing. During the outdoor portions of the inspection, the facility requires personnel to wear hardhats, Hi-Vis vests, hearing protection, safety glasses, and close-toed shoes. During the indoor portion of the inspection, the same PPE is required with the addition of a hair net.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 09:45 a.m. to 11:35 a.m. The inspection team was escorted by Seth Schwarzkopf, Luke Klingenberg, Jose Vergara, Bianca Bandurski, and Daniel Goldfarb.

EPA observed the Harvest Engine Room, and other refrigeration process equipment outside the engine room. The condensers are located on the roof above the engine room (Photos 1). The Harvest Engine Room hazcom signage is located on the entrance door (Photo 2). Inside the Harvest Engine Room, EPA observed the system control panel, fire extinguisher, ammonia transfer lines, air intakes and exhaust vents (Photos 3, 5 and 6), emergency shower and eyewash station (Photo 7), and ammonia sensors, and compressors (Photos 4, 8-11). The recirculator and king valve are located outside the engine room (Photos 12 and 13).

The Fueling Station stores gasoline and diesel used for onsite vehicles (Photo 14). The liquid carbon dioxide tank stores an EPCRA regulated substance is located in the rendering area near the Process Engine Room (Photo 15).

Ventilation system exhaust ducts are located above the Process Engine Room (Photo 16). Emergency audio and visual alarms and shutdown button were located outside the Process Engine Room's entrance door (Photo 17). Emergency information and warning/caution signs were posted on the engine room entrance door (Photo 17). Frost was observed on several sections of piping on refrigeration system equipment in the engine room (Photos 18 and 19). A compressor maintenance log was observed in the engine room (Photo 20). A missing dial for chiller and three, open buckets collecting used oil were observed (Photos 21-24). An emergency shower and eyewash station, four ammonia sensors, and an audio/visual alarm were observed in the engine room (Photos 25-28).

An emergency ventilation switch for the Processing Engine Room is located near the pump out room entrance door (Photo 29). The pump out room entrance door had appropriate hazcom signage (Photo 30). The control panel for the Processing Engine Room is located by the pump out room. A vertical high pressure receiver (HPR) is located inside the Processing Pump Out Room (Photo 31).

The condensers are located on the rooftop above the Processing Engine Room (Photos 32 and 33). Ammonia transfer lines are located on the rooftop (Photos 34-37). The piping was labeled and color coded. A rusty pump-out ammonia line (orange) was observed on the rooftop (Photo 38).

EPCRA-regulated industrial cleaning supplies are stored in the Acid Base Storage Room. Chemicals are separated by acids and bases and an emergency shower and eyewash station is present in the room (Photos 39 and 40).

The liquid carbon dioxide and nitrogen vertical storage tanks are located outside on the exterior of the Wendy's wing (Photo 41).

EPA Inspectors Mhara Coffman and Erin Williams, and EPA Contractor, Robert Faries continued the tour of the process areas escorted by Luke Klingenburg, and Bianca Bandurski. Ammonia transfer lines and evaporators were observed in the Box Storage Area where beef is packaged and stored (Photos 42-45). Ammonia transfer lines were observed in the Wendy's Wing (Photos 46-47) and the Carcass Storage Area (Photo 48).

After touring the indoor RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Barbara Salter, Seth Schwarzkopf, Luke Klingenberg, Jose Vergara, Bianca Bandurski, Daniel Goldfarb.

INFORMATION COLLECTED FROM FACILITY

During the inspection no documentation was collected.

AREAS OF CONCERNS

The following is a list of areas of concern identified.

1. Tyson Fresh Meats has no documentation on emergency coordination activities between 2018 and 2024 and emergency response exercises with the fire department. [68.10(b)-(d)]. The LEPC and Walla Walla County fire department toured the facility on May 13, 2024.
2. Tyson Fresh Meats has not developed and implemented an exercise program for its emergency response program. Tyson Fresh Meats was unable to provide documentation of coordination with emergency response personnel or emergency response contractors for field and tabletop exercises. [68.96(b)(1) and (b)(2)].

FOLLOW-UP DOCUMENTS REQUESTED

The following documents were unable to be located during the inspection by the facility representatives. The documents were requested to be sent to EPA by 29 May, 2024. These documents were reviewed after the inspection to determine compliance with Section 112(r) of the CAA.

1. Provide documentation of emergency coordination since 2018.

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Mhara Coffman, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

MAIGHDEAN COFFMAN Digitally signed by MAIGHDEAN COFFMAN
Date: 2024.10.28 13:09:16 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2024.11.13 10:48:51 -08'00'

RMP Coordinator Signature

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2024.11.08 13:54:26 -08'00'

EPCRA Coordinator Signature

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.11.14 14:22:36 -08'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

Attachment A: Photo Log and Photographs

Attachment B: Tier II Report

Attachment A – Photo Log

Site Name: Tyson Fresh Meats

City, State: Pasco, WA

Photographer: Robert Faries, Weston Solutions

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	5/15/2024	9:45 AM	Roof-mounted condenser atop Harvest Engine Room Location in Facility: Harvest Building Roof
Photo2.jpg	2	5/15/2024	9:49 AM	Entrance to Harvest Engine Room with hazcom signage Location in Facility: Harvest Engine Room
Photo3.jpg	3	5/15/2024	9:52 AM	Refrigeration system control panel Location in Facility: Harvest Engine Room
Photo4.jpg	4	5/15/2024	9:52 AM	Refrigeration system compressor Location in Facility: Harvest Engine Room
Photo5.jpg	5	5/15/2024	9:55 AM	Ammonia transfer lines and system exhaust vent Location in Facility: Harvest Engine Room
Photo6.jpg	6	5/15/2024	9:58 AM	Ammonia transfer lines and system air intake Location in Facility: Harvest Engine Room
Photo7.jpg	7	5/15/2024	10:00 AM	Emergency shower and eyewash station Location in Facility: Harvest Engine Room
Photo8.jpg	8	5/15/2024	10:05 AM	Ammonia sensors Location in Facility: Harvest Engine Room
Photo9.jpg	9	5/15/2024	10:10 AM	Ammonia sensors and alarm Location in Facility: Harvest Engine Room
Photo10.jpg	10	5/15/2024	10:12 AM	Overview of ammonia transfer lines, system controls, and receivers Location in Facility: Harvest Engine Room
Photo11.jpg	11	5/15/2024	10:12 AM	Refrigeration system belt-driven compressor Location in Facility: Harvest Engine Room
Photo12.jpg	12	5/15/2024	10:15 AM	King valve outside engine room Location in Facility: Harvest Engine Room Exterior
Photo13.jpg	13	5/15/2024	10:15 AM	Harvest recirculator with inspection plate Location in Facility: Harvest Engine Room Exterior

Photo14.jpg	14	5/15/2024	10:17 AM	Gasoline and diesel fuel storage and pumps Location in Facility: Fueling Station
Photo15.jpg	15	5/15/2024	10:18 AM	Liquid carbon dioxide tank Location in Facility: Facility Exterior near Process Engine Room
Photo16.jpg	16	5/15/2024	10:18 AM	Process ventilation system, vent outlets are located on the roof Location in Facility: Process Area Exterior
Photo17.jpg	17	5/15/2024	10:18 AM	Processing Engine Room entrance with hazcom signage and alarm Location in Facility: Processing Engine Room
Photo18.jpg	18	5/15/2024	10:19 AM	Frosted refrigeration system equipment Location in Facility: Processing Engine Room
Photo19.jpg	19	5/15/2024	10:20 AM	Frosted refrigeration system equipment Location in Facility: Processing Engine Room
Photo20.jpg	20	5/15/2024	10:20 AM	Compressor inspection log Location in Facility: Processing Engine Room
Photo21.jpg	21	5/15/2024	10:21 AM	Missing dial on refrigeration system chiller Location in Facility: Processing Engine Room
Photo22.jpg	22	5/15/2024	10:22 AM	Used oil bucket staged near refrigeration equipment Location in Facility: Processing Engine Room
Photo23.jpg	23	5/15/2024	10:22 AM	Used oil bucket staged near refrigeration equipment Location in Facility: Processing Engine Room
Photo24.jpg	24	5/15/2024	10:22 AM	Used oil bucket staged near refrigeration equipment Location in Facility: Processing Engine Room
Photo25.jpg	25	5/15/2024	10:22 AM	Ammonia alarm Location in Facility: Processing Engine Room
Photo26.jpg	26	5/15/2024	10:23 AM	Emergency shower and eyewash station Location in Facility: Processing Engine Room
Photo27.jpg	27	5/15/2024	10:23 AM	Ammonia sensors Location in Facility: Processing Engine Room
Photo28.jpg	28	5/15/2024	10:23 AM	Ammonia sensors Location in Facility: Processing Engine Room
Photo29.jpg	29	5/15/2024	10:23 AM	Manual ventilation control Location in Facility: Processing Pump Out Room

Photo30.jpg	30	5/15/2024	10:24 AM	Door to Processing Pump Out Room with hazcom signage and alarm Location in Facility: Processing Pump Out Room
Photo31.jpg	31	5/15/2024	10:24 AM	High pressure receiver Location in Facility: Processing Pump Out Room
Photo32.jpg	32	5/15/2024	10:27 AM	Condensers Location in Facility: Rooftop of Processing Engine Room
Photo33.jpg	33	5/15/2024	10:27 AM	Condensers Location in Facility: Rooftop of Processing Engine Room
Photo34.jpg	34	5/15/2024	10:28 AM	Overview of facility refrigeration system transfer lines Location in Facility: Rooftop
Photo35.jpg	35	5/15/2024	10:28 AM	Overview of ammonia transfer lines Location in Facility: Rooftop
Photo36.jpg	36	5/15/2024	10:29 AM	Overview of ammonia transfer lines Location in Facility: Rooftop
Photo37.jpg	37	5/15/2024	10:32 AM	Overview of ammonia refrigeration transfer lines Location in Facility: Rooftop
Photo38.jpg	38	5/15/2024	10:32 AM	Rusty pump-out ammonia line (orange) Location in Facility: Rooftop
Photo39.jpg	39	5/15/2024	10:57 AM	Emergency shower and eyewash station Location in Facility: Acid Base Chemical Storage Area
Photo40.jpg	40	5/15/2024	10:59 AM	Overview of EPCRA regulated chemicals Location in Facility: Acid Base Chemical Storage Area
Photo41.jpg	41	5/15/2024	11:11 AM	Carbon dioxide and nitrogen storage tanks Location in Facility: Facility Exterior Wendy's Wing
Photo42.jpg	42	5/15/2024	11:20 AM	Ammonia transfer lines Location in Facility: Box Storage Area
Photo43.jpg	43	5/15/2024	11:22 AM	Ammonia transfer lines Location in Facility: Box Storage Area
Photo44.jpg	44	5/15/2024	11:23 AM	Ammonia transfer lines Location in Facility: Box Storage Area
Photo45.jpg	45	5/15/2024	11:25 AM	Ammonia transfer lines and evaporators Location in Facility: Box Storage Area

Photo46.jpg	46	5/15/2024	11:33 AM	Ammonia transfer lines Location in Facility: Wendy's Wing
Photo47.jpg	47	5/15/2024	11:35 AM	Ammonia transfer lines Location in Facility: Wendy's Wing
Photo48.jpg	48	5/15/2024	11:35 AM	Ammonia transfer lines Location in Facility: Carcass Storage Area